

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
v.)
) Case No. 3:24-mj-00210
KENNETH JAMES STOPKOTTE)
)
)

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 1/30/2024 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC s. 472	uttering or passing counterfeit securities or obligations of the United States

This criminal complaint is based on these facts:

See Attached Affidavit of Matthew DeMasters

Continued on the attached sheet.

Matthew DeMasters

Complainant's signature

Matthew DeMasters, SA of the USSS

Printed name and title

Sworn to by reliable electronic means -- namely, telephone.

Date: April 12, 2024

City and state: Dayton, Ohio

Caroline H. Gentry
United States Magistrate Judge



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Matthew DeMasters, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent (SA) with the United States Secret Service (USSS), an investigative and law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I have been employed by the USSS as a SA since November of 2007. I am currently assigned to the USSS Dayton Resident Office, which is responsible for investigations involving financial crimes. I have completed approximately 583 hours of instruction at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. Additionally, I have completed 565 hours of training at the United States Secret Service John J. Rowley Training Center (JJRTC) in Laurel, Maryland in counterfeit, financial, and cyber related investigations including but not limited to computer fraud, identity theft, and access device fraud. I have also attended training in the proper identification, preservation, collection, and investigation of digital devices and storage media, and the USSS certifies me as such. I have investigated numerous individuals for a wide variety of federal felony offenses, including computer fraud, access device fraud, child exploitation, counterfeiting, and wire fraud. I have conducted open-source social media research, analyzed financial records, participated in witness and subject interviews, and participated in the execution of warrants to include the search and seizure of electronic communications accounts, to include emails, social media accounts, messaging applications, and other electronically stored information.

2. This affidavit is made in support of an arrest warrant for KENNETH JAMES STOPKOTTE (hereinafter referred to as "STOPKOTTE") for uttering counterfeit obligations or securities in violation of 18 U.S.C. § 472.

3. I have personally participated in the investigation of STOPKOTTE, as discussed below. I am familiar with the facts and circumstances of this investigation, through discussions with other law enforcement agents involved in this investigation. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

4. This Affidavit does not contain every fact known to the investigation, but only those deemed necessary to demonstrate sufficient probable cause that STOPKOTTE committed the offenses alleged in the complaint.

PERTINENT FEDERAL CRIMINAL STATUTES

5. 18 U.S.C. § 472 states whoever, with intent to defraud, passes, utters, publishes, or sells, or attempts to pass, utter, publish, or sell, or with like intent brings into the United States or keeps in possession or conceals any falsely made, forged, counterfeited, or altered obligation or other security of the United States shall be fined under this title or imprisoned not more than 20 years, or both.

FACTS SUPPORTING PROBABLE CAUSE – MENARDS, TIPP CITY, OH

6. On or about February 09, 2024, Tipp City Police Department (TCPD) Officer Seth Victor contacted me regarding a case involving the passing of suspected counterfeit Federal Reserve Note (FRN). Officer Victor responded to Menards, 75 Weller Drive, Tipp City, OH (Menards TC) and met with a Menards Loss Prevention (MLP) employee who reported the passing of a suspected counterfeit \$20 FRN. MLP stated that, on or about February 08, 2024, at approximately 1658 hours, an unidentified male entered the Menards store and purchased a single tube of caulk. The unidentified male handed a \$20 FRN and \$.90 to the cashier as payment; the Menards team member suspected that the \$20 FRN was counterfeit. MLP caught up with the unidentified male in the parking lot and asked if he had another form of payment. MLP advised the male that the FRN was suspected as counterfeit. The unidentified male provided another \$20 FRN which MLP believed was genuine. After returning inside the store, MLP

was made aware of an “in-store alert” for an unknown male who matched the description of the customer with whom they interacted. MLP advised Officer Victor that based on the “in-store alert” the unidentified male had visited different Menards locations and purchased a tube of caulk with a suspected counterfeit \$20 FRN.

7. Continuing on or about February 09, 2024, MLP provided a photo of the vehicle driven by the subject which appeared to be a blue Jeep Renegade with a black roof. Using investigative resources, TCPD was able to identify a vehicle that matched the description of the vehicle from the Menards photographs. Database inquiries for OH Temporary license plate R775278 showed the vehicle is registered to Kenneth James STOPKOTTE, 157 Chateau Valley Lane, South Lebanon, OH, 45065.

8. The suspected counterfeit \$20 FRN was received by the USSS from Menards – Tipp City on or about March 08, 2024. After a thorough examination by your affiant, it was determined the suspected counterfeit note is lacking several security features found on a genuine \$20 FRN, therefore the aforementioned \$20 FRN bearing serial number AD54488864 is not a genuine \$20 FRN.

MENARDS, MIAMISBURG, OH

9. On or about January 30, 2024, an individual matching the description of STOPKOTTE, visited Menards located at 8480 Springboro Pike, Miamisburg, OH (Menards – Miamisburg). STOPKOTTE returned a tube of caulk and proceeded to the paint area of the store. STOPKOTTE picked up a tube of caulk from the paint section and proceeded to the front registers. STOPKOTTE purchased the tube of caulk with a \$20 FRN and \$.60 from Menards Team Member/Cashier 2297981. Shortly after STOPKOTTE departed the store, the front-end manager suspected the \$20 FRN was counterfeit and recalled a previous incident where an individual matching the description of STOPKOTTE purchased items using suspected counterfeit \$20 FRNs.

10. The suspected counterfeit \$20 FRN was received by the USSS from Menards – Miamisburg on or about February 29, 2024. After a thorough examination by your affiant, it was determined the suspected counterfeit note is lacking several security features found on a genuine \$20 FRN, therefore the aforementioned \$20 FRN bearing serial number GC53330097L is not a genuine \$20 FRN.

11. During the purchase of the tube of caulk on or about January 30, 2024, a \$20 FRN was tendered bearing serial Number GC53330097L. A search of USSS counterfeit databases revealed an extensive passing history for counterfeit \$20 FRNs bearing serial number GC53330097L. As detailed below, STOPKOTTE, in fact, possessed a counterfeit FRN with that same serial number during an incident in 2018.

MENARDS, COLUMBUS EAST, OH

12. On or about January 21, 2024, an individual matching the description of STOPKOTTE, visited Menards located at 6800 Broad Street, Columbus, OH (Menards – Columbus East). STOPKOTTE returned a tube of caulk and proceeded to walk throughout the store. STOPKOTTE picked up a tube of caulk and proceeded to the front registers. STOPKOTTE purchased the tube of caulk with a \$20 FRN and \$.60 from Menards Team Member/Cashier 2189647.

13. During the purchase of the tube of caulk on or about January 21, 2024, a \$20 FRN was tendered. MLP provided images of three (3) suspected counterfeit FRNs bearing serial numbers PB42299964E, MK36833489A, and NJ20553934A. MLP can't attribute the passing of the FRNs to STOPKOTTE. A search of the USSS counterfeit databases revealed a passing history for all three (3) serial numbers. During the arrest of STOPKOTTE on April 18, 2018, by Dayton Police Department, STOPKOTTE possessed one (1) counterfeit \$20 FRN bearing serial number PB42299964E.

14. The suspected counterfeit \$20 FRNs were received by the USSS from Menards – Columbus East on or about April 01, 2024. After a thorough examination by your affiant, it was

determined the suspected counterfeit note is lacking several security features found on a genuine \$20 FRN, therefore the aforementioned \$20 FRNs bearing serial numbers PB42299964E, MK36833489A, and NJ20553934A, are not genuine \$20 FRNs.

MENARDS, COLUMBUS WEST, OH

15. On or about January 28, 2024, an individual matching the description of STOPKOTTE, visited Menards located at 831 Hilliard Rome Road, Columbus, OH (Menards – Columbus West). STOPKOTTE returned a tube of caulk and proceeded to walk throughout the store. STOPKOTTE picked up a tube of caulk and proceeded to the front registers. STOPKOTTE purchased the tube of caulk with a \$20 FRN and \$.90 from Menards Team Member/Cashier 21946223.

16. During the purchase of the tube of caulk on or about January 28, 2024, a \$20 FRN was tendered. MLP provided images of one (1) suspected counterfeit FRN bearing serial numbers VA37764789I. MLP can't attribute the passing of the FRNs to STOPKOTTE. A search of the USSS counterfeit databases revealed a passing history for the one (1) serial number. During the arrest of STOPKOTTE on April 18, 2018, by Dayton Police Department, STOPKOTTE possessed one (1) counterfeit \$20 FRN bearing serial number VA37764789I.

17. The suspected counterfeit \$20 FRNs were received by the USSS from Menards – Columbus West on or about April 01, 2024. After a thorough examination by your affiant, it was determined the suspected counterfeit note is lacking several security features found on a genuine \$20 FRN, therefore the aforementioned \$20 FRN bearing serial number VA37764789I, is not a genuine \$20 FRN.

MENARDS – MULTIPLE STORES

18. MLP has provided additional videos, photographs, and reports of an individual passing suspected counterfeit \$20 FRNs in Menard stores located in OH, KY, and IN. The unknown individuals in the video and photographs match the description of STOPKOTTE. Menards locations include – Loveland, OH, Lewis Center, OH, Indianapolis, IN, Florence, KY, Fairfield Township, OH, Fairborn, OH, and Evendale, OH.

PRIOR FEDERAL CONVICTIONS FOR COUNTERFEITING AND BANK LARCENCY

19. I reviewed STOPKOTTE's criminal history and learned that, on or about September 5, 2018, he was convicted in the United States District Court for the Southern District of Ohio for uttering counterfeit obligations in violation of 18 U.S.C. § 472 and sentenced to 21 months of imprisonment. During that incident, STOPKOTTE tendered counterfeit currency at a Dayton Dragon's baseball game and had in his possession two counterfeit \$20 FRNs bearing serial number GC53330097L. As noted above, on or about January 30, 2024, STOPKOTTE tendered a counterfeit note bearing that same serial number to purchase a tube of caulk at Menards in Miamisburg, Ohio.

20. During 2015, STOPKOTTE was convicted in the United States District Court for the Middle District of Tennessee for, among other things, bank larceny in violation of 18 U.S.C. § 2113(b) and was sentenced to 26 months of imprisonment.

21. Consistent with his actions in this investigation, STOPKOTTE has a history of fraudulent activity including passing counterfeit United States currency.

CONCLUSION

22. Based on the totality of the aforementioned factual information, and based upon my training and experience, there is probable cause to believe that beginning on or about January 31, 2024, in the Southern District of Ohio, and elsewhere, KENNETH STOPKOTTE intended to defraud local merchants in violation of 18 U.S.C. § 472 by uttering counterfeit obligations or securities.

23. I therefore respectfully request that a criminal complaint be granted upon this Affidavit.

Matthew DeMasters

Special Agent Matthew DeMasters
United States Secret Service

Sworn to via telephone after submission by reliable electronic means, pursuant to Fed. Crim. R. 4.1 and 41(d)(3) this 12th of April, 2024.

